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13 *Toshiba America, Inc., Toshiba America*
14 *Consumer Products, LLC, Toshiba America*
15 *Information Systems, Inc., and Toshiba*
16 *America Electronic Components, Inc.*

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 (SAN FRANCISCO DIVISION)

20 IN RE: CATHODE RAY TUBE (CRT)
21 ANTITRUST LITIGATION

22 Case No. 07-5944 SC
23 MDL No. 1917

24 This Document Relates to:
25 ALL ACTIONS

26 **DECLARATION OF**
27 **LUCIUS B. LAU IN SUPPORT OF**
28 **THE TOSHIBA DEFENDANTS'**
REPLY IN SUPPORT OF THEIR
OBJECTIONS TO SPECIAL
MASTER'S RECOMMENDED
ORDER DATED NOVEMBER 20,
2014 RE PLAINTIFFS' MOTION
TO COMPEL DEPOSITIONS OF
TOSHIBA WITNESSES

DECLARATION OF LUCIUS B. LAU IN SUPPORT OF THE TOSHIBA DEFENDANTS' REPLY IN
SUPPORT OF THEIR OBJECTIONS TO SPECIAL MASTER'S RECOMMENDED ORDER DATED
NOVEMBER 20, 2014 RE PLAINTIFFS' MOTION TO COMPEL DEPOSITIONS OF TOSHIBA WITNESSES

Case No. 07-5944-SC
MDL No. 1917

1 I, Lucius B. Lau, hereby declare as follows:

2 1. I am an attorney with the law firm of White & Case LLP, counsel for
3 Defendants Toshiba Corporation, Toshiba America, Inc., Toshiba America Consumer
4 Products, LLC, Toshiba America Information Systems, Inc., and Toshiba America Electronic
5 Components, Inc.

6 2. I submit this declaration in support of the Toshiba Defendants' Reply in
7 Support of their Objections to Special Master's Recommended Order Dated November 20,
8 2014 Re Plaintiffs' Motion to Compel Depositions of Toshiba Witnesses, filed
9 contemporaneously herewith. Except for those matters stated on information and belief,
10 which I believe to be true, I have personal knowledge of the facts stated herein, and I could
11 and would competently testify thereto if called as a witness.

12 3. Attached hereto as **Exhibit O** is a true and correct copy of the Order
13 Appointing Special Master, dated June 16, 2008.

14 4. Attached hereto as **Exhibit P** is a true and correct copy of the Order
15 Appointing Special Master For Discovery, dated December 17, 2013

16 5. Attached hereto as **Exhibit Q** is a true and correct copy of a letter from the
17 parties to the Court, dated November 8, 2013.

18 6. Attached hereto as **Exhibit R** is a true and correct copy of a chart listing the
19 party depositions that have occurred after September 5, 2014.

20 7. Attached hereto as **Exhibit S** is a true and correct copy of the Stipulation and
21 Order Regarding Discovery To Occur After September 5, 2014, dated September 5, 2014.

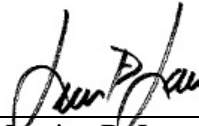
22
23 I declare under penalty of perjury under the laws of the United States of America that
24 the foregoing is true and correct.
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DECLARATION OF LUCIUS B. LAU IN SUPPORT OF THE TOSHIBA DEFENDANTS' REPLY IN
SUPPORT OF THEIR OBJECTIONS TO SPECIAL MASTER'S RECOMMENDED ORDER DATED
NOVEMBER 20, 2014 RE PLAINTIFFS' MOTION TO COMPEL DEPOSITIONS OF TOSHIBA WITNESSES

Case No. 07-5944-SC

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1 Executed this 8th day of December, 2014, in Washington, D.C.

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6 Lucius B. Lau
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